

STATE OF MINNESOTA OFFICE OF THE ATTORNEY GENERAL ST. PAUL 55155

US EPA RECORDS CENTER REGION 5

WARREN SPANNAUS ATTORNEY GENERAL

August 23, 1982

ADDRESS REPLY TO: **ATTORNEY GENERAL'S OFFICE** POLLUTION CONTROL DIVISION 1935 WEST COUNTY ROAD B-2 ROSEVILLE, MN 55113 TELEPHONE: (612) 296-7342

Edward J. Schwartzbauer Dorsey & Whitney 2200 First Bank Place East Minneapolis, MN 55402

Dear Ed:

As a follow-up to our recent telephone conversation, please identify the comprehensive general liability policy(ies) carried by Reilly Tar during the years of its operation in St. Louis Park. As we discussed, comprehensive general liability policies generally did not exclude environmental pollution coverage until approximately 1970.

As we discussed last Thursday, August 19, 1982, you will identify the author(s) of Minnesota Exhibit Nos. 5 through 8, marked at the deposition of Mr. Finch.

Thank you for your cooperation in arranging the depositions of Messrs. Justin, Lesher and Hennessey in Indianapolis during the week of October 11, 1982. We would like to begin the deposition of Mr. Justin at 9:00 a.m., Monday, October 11, 1982. We will thereafter examine Mr. Lesher and Mr. Hennessey. understanding is that you will arrange for Mr. Hennessey to appear at the deposition, without the need for us to issue a subpoena. expect that the depositions will extend through Friday, October 15, 1982.

Very truly yours,

DENNIS M. COYNE Special Assistant Attorney General

DMC/ps

cc: Erica Dolgin

Robert Leininger